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15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA

17 AARON PALM, on behalf of himself and all  
18 others similarly situated,

Case No. 12-cv-01250-JCS

19 Plaintiffs,

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING THE TIME FOR  
PLAINTIFF TO FILE A PRELIMINARY  
APPROVAL MOTION AND  
CONTINUING THE UPCOMING CASE  
MANAGEMENT CONFERENCE**

20 vs.

21 SUR LA TABLE, INC., a Corporation, and  
DOES 1–25

22 Defendants,  
23

24 **STIPULATION AND [PROPOSED] ORDER**

1. WHEREAS the parties reached a settlement in this action at mediation on March 7,  
2013.

2. WHEREAS the parties have been working diligently to complete the settlement agreement, but some of the detailed provisions have required further negotiation.

3. WHEREAS the parties are actively engaged in these negotiations and are hopeful that they can finalize the written settlement agreement within the next few weeks.

4. WHEREAS the Court ordered Plaintiff to file a motion for preliminary approval of the settlement agreement before the next case management conference, which is scheduled for May 10, 2013.

5. WHEREAS Plaintiff has begun drafting the motion for preliminary approval.

However, since the settlement agreement has not yet been finalized, the motion will not be ready for filing by the deadline.

6. THEREFORE, THE PARTIES HEREBY STIPULATE that the upcoming CMC and the motion for preliminary approval filing deadline be postponed 30 days to give the parties sufficient time to complete the further negotiations, finalize the written settlement agreement and complete the motion for preliminary approval.

Date: April 30, 2013

HOYER & ASSOCIATES

David C. Lipps  
Attorney for Plaintiff  
**AARON PALM**

1 Date: April 30 2013

GIBSON, DUNN & CRUTCHER LLP

2 /s/  
3 Michele L. Maryott  
4 Deirdre P. Lanning  
5 Attorneys for Defendant  
6 SUR LA TABLE, INC.

7 Date: 5/2/13

PURSUANT TO STIPULATION, IT IS SO  
8 ORDERED.  
9 Case Management Conference continued to June 21, 2013, at 1:30 PM.

10 Hon. Joseph C. Spero  
11 United States Magistrate Judge  
12

